



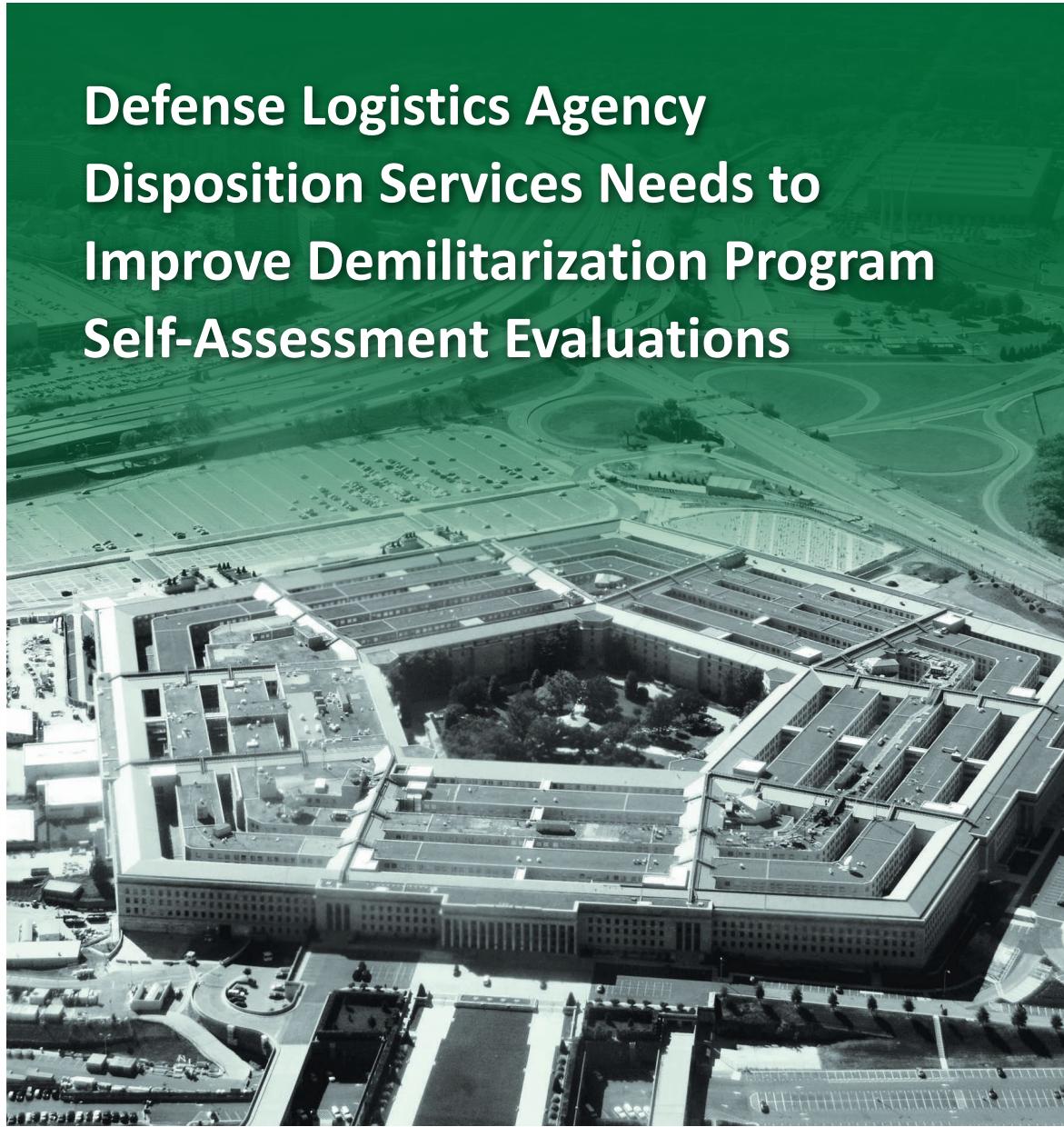
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INSPECTOR GENERAL

U.S. Department of Defense

DECEMBER 20, 2016

Defense Logistics Agency Disposition Services Needs to Improve Demilitarization Program Self-Assessment Evaluations



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Results in Brief

Defense Logistics Agency Disposition Services Needs to Improve Demilitarization Program Self-Assessment Evaluations

December 20, 2016

Objective

Our audit objective was to determine whether the Defense Logistics Agency (DLA) was effectively controlling and disposing of DoD property through its demilitarization program.¹ This is the third in a series of reports on the demilitarization program.

Finding

DLA Disposition Services controlled and disposed of DoD property through the demilitarization program by implementing physical security, inventory reviews, and disposal controls at DLA Centralized Demilitarization Division² Tucson, Arizona, and a mutilation contractor³ in Holbrook, New York, the two sites we visited. However, for self-assessment evaluations⁴ at three DLA Centralized Demilitarization Divisions, personnel did not always:

- report accurate results,
- include supporting documentation, or
- prepare corrective action plans to address deficiencies.

¹ A program that includes demilitarization and mutilation to eliminate the functional capabilities and inherent military design features from DoD property.

² DLA Disposition Services operates three Centralized Demilitarization Divisions; the Tucson, Arizona, location processed the most disposal transactions in FY 2015.

³ DLA Disposition Services sells property requiring mutilation to two contractors; the contractor in Holbrook, New York, purchased the most property.

⁴ Self-assessments are compliance evaluations conducted at DLA Disposition Service sites that use evaluation criteria to determine the effectiveness of specific processes.

Finding (cont'd)

Inadequate execution of the self-assessment program occurred because DLA Centralized Demilitarization Division personnel did not comply with established procedures, and DLA Disposition Services did not provide sufficient oversight of the self-assessment reporting process. Although we observed, tested, and determined physical security, inventory reviews, and disposal controls were in place at the sites visited, inadequate self-assessment evaluations at the three DLA Centralized Demilitarization Divisions could result in noncompliance with laws and regulations and increased risk of inappropriate release of property requiring demilitarization.

Recommendations

We recommend the Director, Defense Logistics Agency Disposition Services, reemphasize to Centralized Demilitarization Division personnel their responsibilities to report accurate self-assessments results, submit all self-assessment supporting documentation, and prepare self-assessment corrective action plans to address deficiencies, in accordance with Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01.

In addition, we recommend the Director, Defense Logistics Agency Disposition Services:

- reemphasize to Disposition Services Compliance Branch personnel their responsibilities to execute oversight of the self-assessment program, and
- update Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01 to require Disposition Services Compliance Branch personnel to review all protocol results for accuracy and inclusion of supporting documentation.



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Results in Brief

Defense Logistics Agency Disposition Services Needs to Improve Demilitarization Program Self-Assessment Evaluations

Management Comments and Our Response

Comments from the Deputy Director, Defense Logistics Agency Logistics Operations, responding for the Director, Defense Logistics Agency Disposition Services, addressed all specifics of the recommendations, and no further comments are required. Please see the Recommendations Table on the next page.

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Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Director, Defense Logistics Agency Disposition Services	None	1.a, 1.b, and 1.c

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**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

December 20, 2016

MEMORANDUM FOR DIRECTOR, DEFENSE LOGISTICS AGENCY DISPOSITION SERVICES

SUBJECT: Defense Logistics Agency Disposition Services Needs to Improve Demilitarization Program Self-Assessment Evaluations (Report No. DODIG-2017-037)

We are providing this report for your information and use. Defense Logistics Agency Disposition Services implemented physical security, inventory reviews, and disposal controls to manage and dispose of DoD property through the demilitarization program at the sites visited. However, for the self-assessment evaluations, Defense Logistics Agency Centralized Demilitarization Division personnel did not always report accurate results, include supporting documentation, or prepare corrective action plans to address deficiencies. We conducted this audit in accordance with generally accepted government auditing standards.

We considered management comments on the draft of this report when preparing the final report. Comments from the Deputy Director, Defense Logistics Agency Logistics Operations, responding for the Director, Defense Logistics Agency Disposition Services, addressed all specifics of the recommendations and conformed to the requirements of DoD Instruction 7650.03; therefore, we do not require additional comments.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-9077 (DSN 664-9077).

Jacqueline L. Wicecarver
Jacqueline L. Wicecarver
Acting Deputy Inspector General
For Audit

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Acronyms and Abbreviations

Introduction

Objective

Our audit objective was to determine whether the Defense Logistics Agency (DLA) was effectively controlling and disposing of DoD property through its demilitarization (DEMIL) program. This report is the third in a series of reports on the DEMIL program. The first report focused on DEMIL coding. The second report focused on long-term storage of property requiring DEMIL. See Appendix A for a discussion of the scope and methodology and prior audit coverage related to the objective.

Background

The DLA, in coordination with the Military Services, is responsible for implementing controls to reduce potential security risks associated with the release or disposition of U.S. Munitions List and Commerce Control List items. U.S. Munitions List items are defense-related property specifically designed, developed, configured, adapted, or modified for military use. Commerce Control List items are designated as nonsensitive or sensitive based on control criteria established by the Department of Commerce. Items on the Commerce Control List are available for reuse only within the DoD, the Foreign Military Sales programs, other Federal agencies, and designated special programs because of the security risks and item sensitivity should they fall into the hands of an adversary.

DLA Disposition Services, a subordinate organization of the DLA, manages the overall DoD excess property disposition program and helps agencies dispose of excess property through reuse, transfer, donation, sale, or disposal. Before disposition on unneeded or excess DoD property, it is important to determine whether that property requires DEMIL (U.S. Munitions List items) or mutilation (Commerce Control List items). DEMIL prevents property from being used for its original intended purpose by eliminating the functional capabilities and inherent military design features from DoD property. Methods of DEMIL range from removal and destruction of critical features to total destruction (including cutting, shredding, and melting). Mutilation of property makes it unfit for its originally intended purpose by cutting, tearing, scratching, crushing, breaking, punching, shearing, burning, or neutralizing. Property is mutilated based on the military uniqueness or to prevent the property from entering the commercial market. Ensuring that property is either demilitarized or mutilated is critical to the United States because failure to do so allows the public and possibly U.S. adversaries to gain access to potentially harmful weapons and parts.

Centralized Demilitarization Divisions and Mutilation Sites

DLA Disposition Services operates Centralized Demilitarization Divisions (CDDs) in Tucson, Arizona; Anniston, Alabama; and McAlester, Oklahoma; and a specialty DEMIL site in Pine Bluff, Arkansas.⁵ These CDD locations are responsible for specific property and either contract for DEMIL services or perform the services onsite. Specifically:

- CDD Tucson receives property requiring DEMIL from western U.S. and Pacific DoD sites and is the primary CDD for aircraft and aircraft parts from all DoD sites. CDD Tucson has an offsite contractor perform DEMIL services.
- CDD Anniston receives property requiring DEMIL from eastern U.S. DoD sites and is the primary CDD for vehicles, small arms weapons, and related parts from all DoD sites. CDD Anniston has an offsite contractor perform DEMIL services.
- CDD McAlester receives vehicles, helicopters, and aircraft parts requiring DEMIL from all DoD sites. CDD McAlester performs DEMIL services onsite.
- Pine Bluff, Arkansas, receives body armor and camouflage nets requiring DEMIL from all DoD sites. Pine Bluff performs DEMIL services onsite.

In FY 2015, DLA Disposition Services performed 143,412 property disposal transactions⁶ that required DEMIL. The following Table shows the transactions breakdown by DEMIL location.

Table. Property Disposal Transactions by DEMIL Location

DEMIL Location	Transactions	Items Disposed
CDD Tucson, Arizona	58,585	1,219,539
CDD Anniston, Alabama	48,910	2,131,764
CDD McAlester, Oklahoma	27,985	627,386
Pine Bluff, Arkansas	7,932	331,723
Total	143,412	4,310,412

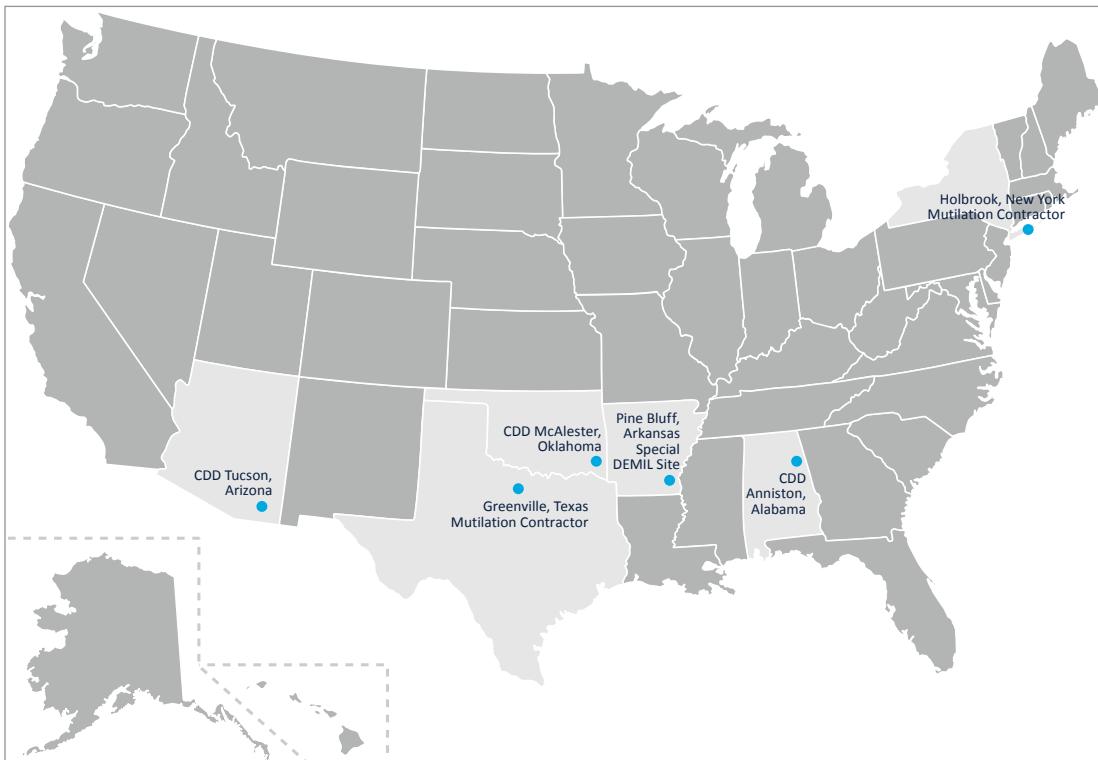
Source: DoD OIG

⁵ DLA Disposition Services also operates CDD Kaiserslautern, Germany; however, we did not review this CDD.

⁶ Disposal transactions could have more than one item.

In addition, DLA Disposition Services sells property requiring mutilation to contractors in Holbrook, New York; and Greenville, Texas. The contractors perform mutilation and shredding at their facilities. In 2015, DLA Disposition Services sold approximately 24.4 million pounds of property requiring mutilation to these contractors. Figure 1 shows CDD and contractor mutilation Continental United States sites.

Figure 1. Continental United States CDD and Contractor Mutilation Sites



Source: DoD OIG

Compliance Assessment Program

DLA Disposition Services established a Compliance Assessment Program, in accordance with DLA Disposition Services Instruction 4155.01,⁷ to provide an end-to-end, in-depth assessment of the disposal processes. The Instruction is applicable to all DLA Disposition Services sites, not the contractor mutilation sites. The Compliance Assessment Program consists primarily of operation site self-assessment and DLA Disposition Services operational effectiveness reviews, as well as the development, review, and monitoring of actions implemented to correct deficiencies. Self-assessments are compliance evaluations that operation site personnel conduct using a set of predetermined protocols to determine the

⁷ DLA Disposition Services Instruction 4155.01, "Compliance Assessment Program (CAP)," August 8, 2011, was canceled and replaced by DLA Disposition Services Standard Operating Procedure (SOP) 4155.01, "Compliance Assessment Program (CAP)," April 17, 2015.

effectiveness of a specific process (or processes). A protocol is a set of factors or evaluation criteria used during self-assessments and operational effectiveness reviews to validate the level of compliance with applicable Federal, State, local, and Trade Security Control⁸ laws and DoD, DLA, and DLA Disposition Services regulations, instructions, policies, and procedures. The self-assessment provides the site the opportunity to identify deficiencies and implement appropriate corrective actions. DLA Disposition Services Compliance Branch personnel perform the operational effectiveness reviews and provide the protocols DLA CDD personnel use to complete self-assessments. Goals of the Compliance Assessment Program are to:

- improve performance by measuring the current level of operational and environmental program effectiveness and compliance with existing regulations and guidance;
- enhance the probability that corrective actions result in sustained effectiveness and compliance;
- provide compliance and noncompliance information to identify trends and systemic weaknesses; and
- promote a culture at DLA Disposition Services that recognizes compliance is everyone's responsibility.

DLA Disposition Services Compliance personnel are required to:

- maintain oversight and control of the Compliance Assessment Management System (CAMS);⁹
- provide and coordinate protocols and instructions to the CDDs to complete self-assessments;
- notify DLA Disposition Services management of self-assessments results, repeat findings, suggested corrective actions, best practices, status of findings, and open or inadequate corrective action plans;
- review self-assessment supporting documentation that DLA Disposition Services field sites submit; and
- track self-assessment findings until closed.

DLA Disposition Services' Annual Statement of Assurance for FY 2015 cites reliance on self-assessment evaluations as one of the keys to the management internal control environment.

⁸ The controls on export or other transfers, DEMIL, or mutilation of DoD personal property. See Appendix A for the laws establishing the requirement for the Trade Security Controls.

⁹ CAMS is a web-based database used to record deficiencies and corrective actions resulting from self-assessments and operational effectiveness reviews. The CAMS rating is a numeric value assigned to each protocol reviewed. The rating is based on the accuracy of the sample size taken during a review.

Review of Internal Controls

DoD Instruction 5010.40¹⁰ requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified an internal control weakness with the execution of the self-assessment evaluation process. Specifically, DLA CDD personnel did not always report accurate results, include supporting documentation, or prepare corrective action plans to address deficiencies. We will provide a copy of the report to the DLA senior official responsible for internal controls.

¹⁰ DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

Finding

DLA CDD Self-Assessment Evaluations Not Always Effective

DLA Disposition Services controlled and disposed of DoD property through the DEMIL program by implementing physical security, inventory reviews, and disposal controls at the sites visited. However, for the DLA CDD self-assessment evaluations, personnel did not always:

- report accurate results,
- include supporting documentation, or
- prepare corrective action plans to address deficiencies.

Inadequate execution of the DLA CDD self-assessment evaluations occurred because personnel did not comply with established procedures and DLA Disposition Services Compliance Branch personnel did not provide sufficient oversight of the DLA CDD self-assessment reporting process. Inadequate self-assessment evaluations could result in noncompliance with laws and regulations, and increased risk of inappropriate release of property requiring DEMIL.

Effective Demilitarization Program Controls

DLA Disposition Services controlled and disposed of DoD property through the DEMIL program by implementing physical security, inventory reviews, and disposal controls at CDD Tucson, Arizona,¹¹ and the contractor mutilation site in Holbrook, New York,¹² the two sites we visited.

Physical Security Controls

DLA Disposition Services implemented physical security controls for DoD property in the DEMIL program. For example:



DLA Disposition Services controlled and disposed of DoD property through the DEMIL program by implementing ... controls.

- (FOUO) CDD Tucson personnel restricted access to property requiring DEMIL, as required by DoD Manual 4160.21, Volume 1,¹³ by storing it in dedicated warehouses or controlled spaces [REDACTED] .

¹¹ Of the three DLA Disposition Services-operated CDDs, Tucson, Arizona, processed the most disposal transactions in FY 2015.

¹² Of the two contractors to which DLA Disposition Services sells property requiring mutilation, the contractor in Holbrook, New York, purchased the most.

¹³ DoD Manual 4160.21, Volume 1, "Defense Materiel Disposition: Disposal Guidance and Procedures," October 22, 2015.

- (FOUO) The CDD Tucson DEMIL contractor restricted access, as required by DoD Instruction 2030.08.¹⁴ Some of the controls the contractor implemented to restrict and monitor access were perimeter fencing, [REDACTED].
- The Holbrook, New York, mutilation contractor restricts access to DoD property requiring mutilation with barbed wire on top of perimeter fencing around the facility, as required by DoD Instruction 2030.08. In addition, as required by the mutilation contract, the contractor maintains a secure area to temporarily store property it could not mutilate the same day the property was received.

Inventory Controls

DLA Disposition Services implemented inventory controls for DoD property in the DEMIL program. For example:

- CDD Tucson personnel developed an FY 2016 plan to perform monthly inventory reviews by zone, which over 12 months would allow for CDD personnel to inventory 100 percent of facility storage space, in accordance with the DLA Disposition Services Warehousing Standard Operating Procedure (SOP).¹⁵ For the January and February 2016 monthly inventory reviews by zone, CDD Tucson personnel identified 100 percent accuracy for the property requiring DEMIL. In addition, CDD personnel stated that they inventory monthly all items valued over \$33,000. For the December 2015 and January 2016 reviews of inventory valued over \$33,000, CDD personnel identified 100 percent accuracy.
- CDD Tucson maintains documentation of property shipped, received, and weighed; and in accordance with DoD Manual 4160.28, Volume 3,¹⁶ CDD Tucson maintains DEMIL verification and certification documentation.
- An onsite DLA representative at the Holbrook, New York, mutilation contractor maintained a spreadsheet for tracking all DoD property received and the movement of the property through the contractor's mutilation process, as required by the DLA Disposition Services Desk Guide for Off-Site Mutilation.¹⁷ The DLA representative updated the spreadsheet daily.

¹⁴ DoD Instruction 2030.08, "Implementation of Trade Security Controls (TCSs) for Transfers of DoD Personal Property to Parties Outside DoD Control," February 19, 2015.

¹⁵ DLA Disposition Services Warehousing SOP "DLA Disposition Services High-Level Warehousing Standard Operating Procedure (SOP)," September 30, 2015.

¹⁶ DoD Manual 4160.28, Volume 3, "Defense Demilitarization: Procedural Guidance," June 7, 2011.

¹⁷ DLA Disposition Services Desk Guide, "Off-Site Mutilation," updated May 15, 2014.

- CDD Tucson personnel generated two supply discrepancy reports for property received during FY 2015 because of inconsistencies identified during the receipt inspection process. The DLA Disposition Services Receiving SOP¹⁸ requires CDD personnel to monitor the supply discrepancy report daily, contact the sending activity weekly, and elevate any supply discrepancy reports unresolved after 14 days. In both instances, CDD Tucson personnel implemented actions to address and resolve the discrepancies.

Disposal Controls

DLA Disposition Services implemented disposal controls for DoD property in the DEMIL program. For example:

- CDD Tucson and DEMIL contractor personnel and Holbrook, New York, mutilation contractor personnel received the required DEMIL training. DoD Manual 4160.28, Volume 1,¹⁹ requires personnel involved with DoD DEMIL to take the Defense DEMIL Program Course and annual refresher training.
- At CDD Tucson, we nonstatistically sampled 60 of the 58,585 disposal transactions and identified that contractor personnel certified that all the sampled items were demilitarized. We also identified that Government personnel verified that the items were demilitarized in accordance with DoD Manual 4160.28, Volume 3.
- Holbrook, New York, mutilation contractor personnel certified mutilation, and an onsite DLA representative verified that the contractor mutilated DoD property, as required by the contract. For example, the contractor mutilated the property by cutting, tearing, scratching, crushing, breaking, punching, shearing, burning, or neutralizing to the point of scrap (Figure 2).



Figure 2. Mutilation of Property
Location: Holbrook, New York
Source: DoD OIG

In addition, after mutilation, the metallic material (Figure 3) was further shredded to sizes no larger than 4 inches by 4 inches (Figure 4).

¹⁸ DLA Disposition Services Receiving SOP, "DLA Disposition Services High-Level Receiving Standard Operating Procedure (SOP)," September 23, 2015.

¹⁹ DoD Manual 4160.28, Volume 1, "Defense Demilitarization: Program Administration," June 7, 2011.



Figure 3. Mutilated Helicopter Blade and Holding Case

Location: Holbrook, New York

Source: DoD OIG



Figure 4. Shredding Operation

Location: Holbrook, New York

Source: DoD OIG

- CDD Tucson had a DEMIL code²⁰ challenge process to validate the accuracy of assigned DEMIL codes. CDD Tucson had a designated holding area where property was stored while the DLA reviewed the accuracy of the property's assigned DEMIL code, as required by Defense Reutilization and Marketing Service Instruction 4160.14.²¹

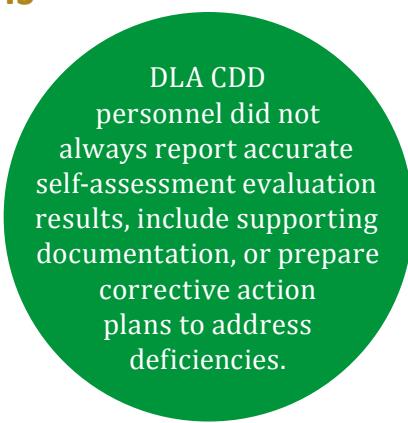
²⁰ A code assigned to DoD property. It indicates the degree of required physical destruction and identifies items requiring specialized procedures and items that do not require DEMIL but may require export control.

²¹ Defense Reutilization and Marketing Service Instruction 4160.14, "Operation Instructions for Disposition Management," May 12, 2008.

- CDD Tucson and contractor personnel stated that they generally process property requiring DEMIL the same day as receipt at the contractor site to reduce the potential for lost or stolen property, as required by the DEMIL contract. CDD personnel stated that there are times property is not demilitarized the day it is received but is priority for DEMIL the next day, which is allowed by the contract. In addition, the DEMIL contractor maintains a designated storage location with a video camera directed at the property that was not demilitarized the same day it was received.

DLA CDD Self-Assessment Evaluations Need Improvement

DLA CDD personnel did not always report accurate self-assessment evaluation results, include supporting documentation, or prepare corrective action plans to address deficiencies identified, as required by DLA Disposition Services SOP 4155.01. We reviewed all 136 protocols from the March 2015 and September 2015 bi-annual self-assessments for the three CDDs and identified 31 protocol evaluations (23 percent) with problems. See Appendix B for the 31 protocol evaluations.



DLA CDD personnel did not always report accurate self-assessment evaluation results, include supporting documentation, or prepare corrective action plans to address deficiencies.

In accordance with DLA Disposition Services SOP 4155.01, when CDD personnel identify deficiencies, they must document the corrective actions taken or required to resolve the deficiency in CAMS within 30 days from certification of self-assessment completion. The implementation of corrective actions must be supported by documented, objective evidence for validation purposes. The success of the self-assessment evaluation program depends on the thorough analysis of the operations and the accuracy of self-reporting.

Results Not Always Accurately Reported

DLA CDD personnel did not ensure self-assessment results were accurately reported for 7 of the 31 protocol evaluations with problems. For example, for the March 30, 2015, self-assessment protocol "Materiel Potentially Presents an Explosive Hazard,"²² CDD Anniston personnel reported that all 10 items sampled for potential explosive hazards had inert (nonexplosive) certifications. However, 2 of the 10 items did not have valid inert certificates. One certificate had incomplete certifier/verifier information, and the other certificate was missing required inert certification wording, which should have resulted in CDD personnel reporting an

²² Protocol ensures all materiel potentially presenting an explosive hazard has valid inert (nonexplosive) certifications.

80 percent accuracy rating instead of the 100 percent accuracy rating reported. In accordance with DLA Disposition Services SOP 4155.01, CDD Anniston personnel should have developed a corrective action plan to ensure actions were taken to fix the problems regarding invalid inert certifications and to prevent the deficiencies from reoccurring.

In another example, for the March 30, 2015, self-assessment protocol “CPU [central processing units]/Laptops,”²³ CDD Tucson personnel reported that all 10 computers sampled had the proper disposal documentation, which meant the CDD received equipment with the hard drives properly removed, destroyed, or wiped. Supporting documentation in CAMS showed that CDD personnel could validate that only 1 of the 10 computers had a disposal certificate, which should have resulted in CDD personnel reporting a 10 percent accuracy rating instead of the 100 percent accuracy rating reported. In accordance with DLA Disposition Services SOP 4155.01, CDD Tucson personnel should have developed a corrective action plan to ensure actions were taken to fix the immediate problem of inadequate disposal documentation and to prevent the deficiency from reoccurring.

Supporting Documentation Not Always Included

Of the 31 protocol evaluations with problems, DLA CDD personnel reported self-assessment results for 8 of the protocols without providing the supporting documentation in CAMS. In addition, DLA CDD personnel did not document in CAMS support for corrective actions for another protocol. DLA Disposition Services SOP 4155.01 requires CDD personnel to document in CAMS the self-assessment results, as well as support for corrective actions. Examples of supporting documentation include training certificates, pictures, listings, and reports that provide an audit trail that documented actions were taken. Without supporting documentation, DLA Disposition Services did not have reasonable assurance CDD personnel identified potential deficiencies and implemented the appropriate corrective actions.

For example, for the March 30, 2015, self-assessment protocol “Scrapyard Management,”²⁴ CDD McAlester personnel reported 100 percent accuracy for the protocol; however, CDD personnel did not meet the supporting documentation requirement for the protocol. Specifically, CDD personnel were required to ensure scrap contractor points of contact were assigned and maintained, and if keys were issued to access the facility the contractor’s information should be listed on the key control register. In addition, the protocol required CDD personnel to review

²³ Protocol ensures that CDD received only central processing units/laptops that had properly prepared certifications that the hard drives had been removed, destroyed, or wiped.

²⁴ Protocol ensures CDD personnel are effectively managing their scrap program.

the scrapyard to determine whether material was properly segregated and had the appropriate scrap classification codes. However, CDD personnel did not document the protocol review results in CAMS to support the 100 percent accuracy reported. Therefore, DLA Disposition Services did not have reasonable assurance CDD personnel were effectively managing the scrap program.

In another example, for the March 30, 2015, protocol “Scrap Mutilation,”²⁵ CDD McAlester personnel reported that mutilation occurred for all three transactions sampled. However, CDD personnel did not include any of the required supporting documentation in CAMS. Specifically, CDD personnel did not record the dates of the shipment, whether the mutilation occurred, who verified the mutilation, and the dates of mutilation. Therefore, DLA Disposition Services did not have reasonable assurance the scrap contractor mutilated the scrap.

In another example, for the September 28, 2015, protocol “DEMIL Code F,”²⁶ CDD Tucson personnel reported that three of six DEMIL code F property transactions reviewed did not have the required DEMIL instructions attached to the items. CDD Tucson personnel identified monthly training for responsible personnel as the corrective action to correct the deficiency. However, CDD personnel did not document support for implemented corrective actions in CAMS. Therefore, DLA Disposition Services did not have reasonable assurance that training was occurring.

Corrective Action Plans Not Always Prepared

Of the 31 protocol evaluations with problems, DLA CDD personnel did not prepare corrective action plans for 15 of the protocols reviewed that had self-assessment accuracy ratings less than 100 percent. DLA Disposition Services SOP 4155.01 requires CDD personnel to document corrective action plans in CAMS, within 30 days, for self-assessment evaluations with review accuracy ratings less than 100 percent. For example, for the protocol “Aging Inventory,”²⁷ CDD Anniston personnel reported 1 deficiency for the March 30, 2015, self-assessment and 20 deficiencies for the September 28, 2015, self-assessment. In accordance with the DLA Disposition Services SOP, DLA CDD Anniston personnel should have developed and documented corrective action plans in CAMS to verify the CDD was managing the property remaining on the inventory record for an extended period. CDD personnel uses corrective action plans to ensure actions are taken to fix immediate problems and provide the CDD with a strong plan to prevent reoccurrences.

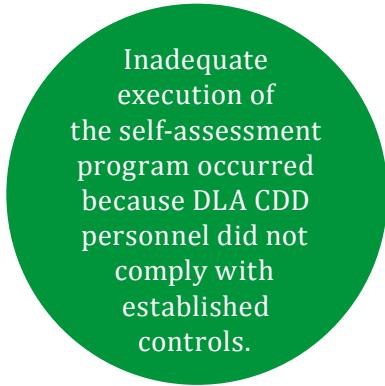
²⁵ Protocol verifies mutilation of scrap performed by the scrap contractor.

²⁶ DEMIL Code F is assigned to U.S. Munitions List items that require special DEMIL instructions because of the environmental, safety, or health hazards associated with their DEMIL.

²⁷ Protocol verifies that the CDD is managing the property remaining on the inventory record for an extended period.

Inadequate Execution of the Self-Assessment Program

Inadequate execution of the self-assessment program occurred because DLA CDD personnel did not comply with established controls. Additionally, DLA Disposition Services Compliance Branch personnel did not always provide sufficient oversight of the self-assessment reporting process.



Inadequate execution of the self-assessment program occurred because DLA CDD personnel did not comply with established controls.

Anniston, McAlester, and Tucson CDD personnel should have executed self-assessment evaluation procedures established in DLA Disposition Services SOP 4155.01, which requires reporting accurate results, including supporting documentation, and preparing corrective action plans. The DLA Disposition Services SOP states that the success of the self-assessment program depends on the thorough self-analysis of CDD operations and the accuracy of self-reporting. At CDD Tucson (the CDD site we visited) a management official stated that he did not realize corrective action plans were required for protocols scored at 90 percent and higher, although DLA Disposition Services SOP 4155.01 was clear regarding this requirement. The CDD official acknowledged that he should have provided corrective action plans. The Director, DLA Disposition Services, should reemphasize to CDD personnel their responsibilities to report accurate self-assessments results, submit all self-assessment supporting documentation, and prepare self-assessment corrective action plans to address deficiencies, in accordance with DLA Disposition Services SOP 4155.01.

In addition, DLA Disposition Services Compliance Branch personnel did not always ensure corrective action plans, including documented actions to resolve the discrepancies, were documented in CAMS before closing self-assessment findings. DLA Disposition Services SOP 4155.01 requires DLA Disposition Services personnel to ensure corrective action plans, and actions to resolve discrepancies, are documented in CAMS. A DLA Disposition Services Compliance Branch official stated that Compliance Branch personnel did not accurately follow the processes outlined in DLA Disposition Services SOP 4155.01. In addition, a Compliance Branch member stated that Compliance Branch personnel would close unresolved findings and ensure that protocols with unresolved findings were added to the next self-assessment or operational effectiveness reviews. The Director, DLA Disposition Services, should reemphasize to DLA Disposition Services, Compliance Branch personnel their responsibilities to follow the requirements established by DLA Disposition Services SOP 4155.01, for the oversight of the CDD self-assessment program.

Also, DLA Disposition Services Compliance Branch personnel did not always ensure CDDs reported accurate results or entered the required supporting documentation in CAMS for all self-assessment protocols and deficiencies. A Compliance Branch official stated that Compliance Branch personnel relied on CDD certifying supervisors to ensure the accuracy of self-assessment reporting and that Compliance Branch personnel did not notice the inaccurate results, so corrective action plans were not requested. Although DLA Disposition Services SOP 4155.01 does not specifically state DLA Disposition Services Compliance Branch personnel should review the CDD self-assessment evaluations for accuracy and completeness, it is important that DLA Disposition Services Compliance Branch personnel review protocol results, especially because the CDD's thorough self-analyses of its operations and the accuracy of self-reporting is critical to the success of the program. The Director, DLA Disposition Services, should update DLA Disposition Services SOP 4155.01 to require DLA Disposition Services Compliance Branch personnel to review all protocol results for accuracy and inclusion of supporting documentation.

Success of the Self-Assessment Evaluation Program Depends on Thorough Analysis and Accuracy of Self-Reporting

DLA Disposition Services implemented physical security, inventory reviews, and disposal controls at the sites visited. However, DLA CDD personnel did not always complete self-assessment evaluations adequately. Inadequate self-assessment evaluations could lead to noncompliance with Trade Security Control laws, DoD regulations, and DLA policies; and the inappropriate release of property requiring DEMIL. For example, because DLA CDD personnel did not report accurate results, personnel did not prepare corrective action plans to address invalid inert certifications for potentially explosive items and inadequate documentation for computer disposal. Therefore, the self-assessment evaluations did not produce the desired effect, which was to ensure CDD personnel took action to fix immediate problems and prevent reoccurring deficiencies. In addition, because DLA CDD personnel did not include required mutilation supporting documentation that identified the dates items were shipped, whether the mutilation occurred, the dates of the mutilation, and who verified the mutilation, DLA Disposition Services did not have reasonable assurance that scrap contractors mutilated the scrap.

Self-assessments evaluations, required by DLA Disposition Services Instruction 4155.01, are conducted by operational site personnel to determine the effectiveness of specific processes. The success of the self-assessment evaluation program depends on the thorough analysis of the operations and

the accuracy of self-reporting. The Director, DLA Disposition Services, should implement the recommendations to reduce the risk of sensitive property falling into the hands of an adversary.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend the Director, Defense Logistics Agency Disposition Services:

- a. **Reemphasize to Centralized Demilitarization Division personnel their responsibilities to report accurate self-assessments results, submit all self-assessment supporting documentation, and prepare self-assessment corrective action plans to address deficiencies, in accordance with Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01.**

Defense Logistics Agency Comments

The Deputy Director, DLA Logistics Operations, responding for the Director, DLA Disposition Services, agreed, stating that the Director will reemphasize the importance of the self-assessment program and provide the Demilitarization Program office with support and training assistance. In addition, the Deputy Director stated that the Demilitarization Program office will clarify Centralized Demilitarization Division personnel responsibilities, and DLA Disposition Services will monitor self-assessments for completeness. The estimated completion date is December 31, 2016.

Our Response

Comments from the Deputy Director addressed all specifics of the recommendations, and no further comments are required.

- b. **Reemphasize to the Disposition Services Compliance Branch personnel their responsibilities to follow the requirements established by Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01, for the oversight of the Centralized Demilitarization Division self-assessment program.**

Defense Logistics Agency Comments

The Deputy Director, DLA Logistics Operations, responding for the Director, DLA Disposition Services, agreed, stating that the Director will reemphasize to the Compliance Branch personnel their responsibilities to comply with requirements

established in DLA Disposition Services Standard Operating Procedure 4155.01. In addition, the Deputy Director stated that the Director, DLA Disposition Services, will direct Compliance Branch personnel to provide oversight and technical support for the Centralized Demilitarization Division self-assessment program. The estimated completion date is December 31, 2016.

Our Response

Comments from the Deputy Director addressed all specifics of the recommendations, and no further comments are required.

- c. **Update Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01 to require Disposition Services Compliance Branch personnel to review all protocol results for accuracy and inclusion of supporting documentation.**

Defense Logistics Agency Comments

The Deputy Director, DLA Logistics Operations, responding for the Director, DLA Disposition Services, agreed, stating that the Director will direct Compliance Branch personnel to conduct a comprehensive review and update, as appropriate, DLA Disposition Services Standard Operating Procedure 4155.01. In addition, the Deputy Director stated that Compliance Branch personnel will work with the respective supervisory chains of command to provide oversight and review self-assessment results for accuracy and supporting documentation. The estimated completion date is March 31, 2017.

Our Response

Comments from the Deputy Director addressed all specifics of the recommendations, and no further comments are required.

Appendix A

Scope and Methodology

We conducted this performance audit from November 2015 through October 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Interviews and Documentation

We interviewed DLA personnel responsible for DEMIL and mutilation of DoD property; CDD contractor personnel responsible for DEMIL at Tucson, Arizona; and mutilation contractor personnel at Holbrook, New York.

We visited:

- DLA Disposition Services, Battle Creek, Michigan;
- DLA Disposition Services, Centralized Demilitarization Division, Tucson, Arizona;
- Centralized Demilitarization Division, DEMIL Contractor, Tucson, Arizona; and
- the Mutilation Contractor, Holbrook, New York.

We reviewed the following DoD and DLA policy and guidance to determine whether DLA Disposition Services followed them for managing the DEMIL program:

- DoD Instruction 2030.08, "Implementation of Trade Security Controls (TCSs) for Transfers of DoD Personal Property to Parties Outside DoD Control," February 19, 2015. This instruction implements the following Trade Security Control related laws:
 - Title 15, Code of Federal Regulations, Subchapter C, parts 730 through 774, "Export Administration Regulations;"
 - Title 22, Code of Federal Regulations, Subchapter M, parts 120 through 130, "International Traffic in Arms Regulations;"
 - Title 22, United States Code, Section 2778 "Arms Export Control Act;" and
 - Title 31, Code of Federal Regulations, Parts 500 through 598, "Office of Foreign Assets Control Regulations."
- DoD Instruction 4160.28, "DoD Demilitarization (DEMIL) Program," April 7, 2011;

- DoD Manual 4160.21, Volume 1, "Defense Materiel Disposition: Disposal Guidance and Procedures," October 22, 2015;
- DoD Manual 4160.28, Volume 1, "Defense Demilitarization: Program Administration," June 7, 2011;
- DoD Manual 4160.28, Volume 2, "Defense Demilitarization: Demilitarization Coding," June 6, 2011;
- DoD Manual 4160.28, Volume 3, "Defense Demilitarization: Procedural Guidance," June 7, 2011;
- Defense Reutilization and Marketing Service Instruction 4160.14, "Operating Instructions for Disposition Management," May 12, 2008;
- DLA Disposition Services Instruction 4155.01, "Compliance Assessment Program (CAP)," August 8, 2011;
- DLA Disposition Services J53 SOP 4155.01, "Compliance Assessment Program (CAP)," April 17, 2015;
- DLA Disposition Services SOP, "DLA Disposition Services High-Level Receiving Standard Operating Procedure (SOP)," September 23, 2015;
- DLA Disposition Services SOP, "DLA Disposition Services High-Level Warehousing Standard Operating Procedure (SOP)," September 30, 2015;
- DLA Disposition Services Desk Guide, "Off-Site Mutilation," updated May 15, 2014;
- DLA Disposition Services Desk Top Guide, "DEMIL Challenge," December 31, 2015;
- DLA Disposition Services Desk Top Guide, "DEMIL Process," December 31, 2015; and
- DLA Disposition Services Desk Top Guide, "DEMIL as a Condition of Sale," December 31, 2015.

In addition, we reviewed the self-assessments, operational effectiveness reviews, supply discrepancy reports, property disposal transactions, DEMIL and mutilation contracts, and training certificate data.

Method to Determine Inadequate Self-Assessment

To determine whether CDD personnel completed self-assessments in accordance with the protocols and DLA Disposition Services instructions, we reviewed all 136 protocols for the three CDDs from the March 2015 and September 2015 bi-annual self-assessments. We compared protocol supporting documentation CDD personnel recorded in CAMS to the protocol tasking instructions for accuracy. For protocols that we identified as deficient, we determined whether the deficiencies were included in the protocol accuracy rating and whether a corrective action plan was documented in CAMS and approved by DLA Disposition Services to address the deficiencies.

Method to Review Property DEMIL and Mutilation Transactions

To determine the number of property disposal transactions and items disposed by DEMIL location, an analyst at DLA Disposition Services provided Excel spreadsheets containing DEMIL transactions. At CDD Tucson, we nonstatistically sampled 60 of 58,585 disposal transactions to determine whether contractor personnel certified that sampled items were demilitarized and whether Government personnel verified that the items were demilitarized. In addition, to determine the weight of property requiring mutilation sold by DLA Disposition Services to contractors in 2015, we obtained the weekly mutilation shipments received reports from the DLA Disposition Services risk and controls manager.

Use of Computer-Processed Data

We used computer-processed data that DLA Disposition Services provided. We used disposal transaction records from the DLA Enterprise Business System to determine the scope of DEMIL transactions during FY 2015 at CDD Anniston, Alabama; CDD McAlester, Oklahoma; CDD Tucson, Arizona; and Pine Bluff, Arkansas. For the Tucson CDD, we nonstatistically selected 60 of 58,585 disposal transactions; 50 transactions were selected at random, and we selected the top 10 transactions by number of items associated with the transaction. We then compared the systems data to hard copy documents, and determined whether appropriate personnel certified and verified that DEMIL occurred. All 60 transactions had corresponding hard copy documents that provided assurance of reliability for our sample and subsequent analysis. We used DLA Disposition Services records of shipments to the contractors to determine the scope of mutilation transactions during 2015.

In addition, we used data from CAMS to determine the actions taken by the CDDs and DLA Disposition Services oversight of the March 30, 2015, and September 28, 2015, self-assessments. To assess the reliability of protocols in DLA Disposition Services data, we compared CAMS reports to the supporting documentation uploaded to CAMS and worked closely with agency officials to discuss any data problems. We reviewed all 136 protocol evaluations and found discrepancies, such as blank fields or improperly recorded data, in 31 evaluations. We notified DLA Disposition Services personnel of these discrepancies. In each case of a discrepancy, the data proved sufficiently reliable in highlighting inaccurate results, unsupported documentation, or nonexistent corrective action plans.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO) and the Department of Defense Office of Inspector General (DoD OIG) issued four reports discussing disposal of property requiring DEMIL. Unrestricted GAO reports can be accessed at <http://www.gao.gov>. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/pubs/index.cfm>.

GAO

Report No. GAO-15-538, "Defense Logistics - Improved Data and Information Sharing Could Aid in DoD's Management of Ammunition Categorized for Disposal," July 21, 2015

This report identified that while DoD maintained information on its excess, obsolete, and unserviceable conventional ammunition for the military services and shared this information on a limited basis with other government agencies, its management of its conventional ammunition awaiting demilitarization and disposal stockpile could be strengthened.

DoD OIG

Report No. DODIG-2016-036, "Management of Items in the Defense Logistics Agency's Long-Term Storage Needs Improvement," December 22, 2015

This report found that DLA did not effectively manage long-term storage inventory. Specifically, DLA stored items in long-term storage inventory that exceeded historical demand and, therefore, were not justified for retention.

Report No. DODIG-2015-031, "The Services Need To Improve Accuracy When Initially Assigning Demilitarization Codes," November 7, 2014

This report found that the Services were not properly coding DoD property when initially registering items in the DoD supply system. Specifically, of the 33,364 DEMIL codes assigned during the 2-year period ending September 30, 2012, the DoD Demilitarization Coding Management Office determined that 8,872 codes were inaccurate.

Report No. DODIG-2014-007, "Defense Logistics Agency Disposition Services Afghanistan Disposal Process Needed Improvement," November 8, 2013

This report found that DLA Disposition Services in Afghanistan did not have adequate controls over disposal of excess equipment.

Appendix B

List of 31 Protocol Evaluations With Problems

Count	Centralized Demilitarization Division	Self-Assessment Date	Protocol	Problem
1	Anniston	March 2015	Material Potentially Presenting Explosive Hazard	Inaccurate Results
2	Anniston	March 2015	Aging Inventory	Nonexistent Corrective Action Plan
3	McAlester	March 2015	Pilferable Storage Area	Nonexistent Corrective Action Plan
4	McAlester	March 2015	DEMIL Certifications	Unsupported Documentation
5	McAlester	March 2015	DEMIL Code Challenges	Unsupported Documentation
6	McAlester	March 2015	Approval & Scrap Accountable Record	Unsupported Documentation
7	McAlester	March 2015	Scrapyard Management	Unsupported Documentation
8	McAlester	March 2015	Scrap Mutilation	Unsupported Documentation
9	Tucson	March 2015	CPUs / LapTops	Inaccurate Results
10	Tucson	March 2015	Mobile Communication Equipment	Inaccurate Results
11	Tucson	March 2015	Unprocessed Receipts	Nonexistent Corrective Action Plan
12	Tucson	March 2015	Pilferable Storage Area	Nonexistent Corrective Action Plan
13	Tucson	March 2015	Aging Inventory	Nonexistent Corrective Action Plan
14	Anniston	September 2015	Inter-service Support Agreement	Inaccurate Results
15	Anniston	September 2015	DEMIL Code F	Nonexistent Corrective Action Plan
16	Anniston	September 2015	Material Potentially Presenting Explosive Hazard	Nonexistent Corrective Action Plan
17	Anniston	September 2015	Memorandum of Understanding	Nonexistent Corrective Action Plan
18	Anniston	September 2015	Training	Nonexistent Corrective Action Plan
19	Anniston	September 2015	Aging Inventory	Nonexistent Corrective Action Plan
20	McAlester	September 2015	Scrapyard Management	Inaccurate Results

List of 31 Protocol Evaluations With Problems (cont'd)

Count	Centralized Demilitarization Division	Self-Assessment Date	Protocol	Problem
21	McAlester	September 2015	Scrap Mutilation	Inaccurate Results
22	McAlester	September 2015	Pilferable Storage Area	Nonexistent Corrective Action Plan
23	McAlester	September 2015	DEMIL Code F	Unsupported Documentation
24	McAlester	September 2015	Receipt & Processing of DEMIL Property	Unsupported Documentation
25	McAlester	September 2015	Inter-service Support Agreement	Unsupported Documentation
26	Tucson	September 2015	Material Potentially Presenting Explosive Hazard	Inaccurate Results
27	Tucson	September 2015	Unprocessed Receipts	Nonexistent Corrective Action Plan
28	Tucson	September 2015	Vehicles	Nonexistent Corrective Action Plan
29	Tucson	September 2015	Security Binder	Nonexistent Corrective Action Plan
30	Tucson	September 2015	Electronic File System	Nonexistent Corrective Action Plan
31	Tucson	September 2015	DEMIL Code F	Unsupported Documentation

Management Comments

Defense Logistics Agency



DEFENSE LOGISTICS AGENCY
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DEC 05 2016

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Response to DODIG Draft Report, "Defense Logistics Agency Disposition Services Needs to Improve Demilitarization Program Self-Assessment Evaluations (Project #D2016-D000RD-0057.000)

Attached is the Defense Logistics Agency's (DLA) response to the subject Draft Report. We appreciate the opportunity to review and comment on the findings and recommendations. Management comments and recommendations are outlined on the attachment.

The point of contact for this audit is [REDACTED], DLA Office of the Inspector General, [REDACTED] or email: [REDACTED]@dla.mil.

MICHAEL D. SCOTT
Deputy Director
DLA Logistics Operations

Attachment:
As stated

Defense Logistics Agency (cont'd)

DLA J3 and DLA Disposition Services

**Response to Recommendations contained in the November 4, 2016 Draft Report:
DoD IG Draft Report, "Defense Logistics Agency Disposition Services Needs to Improve
Demilitarization Program Self-Assessment Evaluations"
(Project #D2016-D000RD-0057.000)**

Recommendation 1a: Reemphasize to Centralized Demilitarization Division personnel their responsibilities to report accurate self-assessments results, submit all self-assessment supporting documentation, and prepare self-assessment corrective action plans to address deficiencies, in accordance with Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01.

DLA Response to Recommendation 1a: Concur. The Director, DLA Disposition Services will reemphasize the importance of the self-assessment program and direct DLA Disposition Services Compliance Branch to provide support and training assistance to the Demilitarization Program office at HQ by December 31, 2016 via email, DLA Disposition Services and the respective DSD leadership in their efforts to clearly communicate and clarify the responsibilities of CDD personnel, thru both operational and supervisory chains, to perform self-assessments and execute corrective actions to resolve deficiencies and sustain compliant performance in a comprehensive and accurate manner.

Specific actions taken or expected to be taken: Disposition DEMIL Program office will clarify responsibilities of CDD personnel. DLA Disposition Services will continue to monitor self-assessments in CAMs for completeness

Estimated Completion Date: December 31, 2016

Recommendation 1b: Reemphasize to the Disposition Services Compliance Branch personnel their responsibilities to follow the requirements established by Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01, for the oversight of the Centralized Demilitarization Division self-assessment program.

DLA Response to Recommendation 1b: Concur. The Director, DLA Disposition Services will reemphasize to the DLA Disposition Services Compliance Branch the importance of their responsibilities to follow requirements established by DLA Disposition Services Standard Operating Procedure 4155.01. The Director, Disposition Services will further direct the Compliance Branch to ensure it provides sufficient oversight and technical support for the Centralized Demilitarization Division Self-Assessment program, by December 31, 2016 via email.

Specific actions taken or expected to be taken: Re-emphasize to DLA Disposition Services Compliance Branch the importance of their responsibilities to follow requirements established by DLA Disposition Services Standard Operating Procedure 4155.01

Estimated Completion Date: December 31, 2016

Defense Logistics Agency (cont'd)

Recommendation 1c: Update Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01 to require Disposition Services Compliance Branch personnel to review all protocol results for accuracy and inclusion of supporting documentation.

DLA Response to Recommendation 1c: Concur. The Director, Disposition Services will direct DLA Disposition Services Compliance Branch to review the Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01 and update as appropriate. Particular emphasis will be placed on the process for reviewing protocol results for accuracy and the inclusion of supporting documentation. DLA Disposition Services Compliance Branch will continue to provide technical support to all DLA Disposition Service HQ and field activities, including all CDDs, they will work in concert with the respective supervisory chain of command with authority over the office/field activity/CDD to provide oversight and certify the completion and accuracy of both the self-assessment results and supporting documentation.

Specific actions taken or expected to be taken: Review the Defense Logistics Agency Disposition Services Standard Operating Procedure 4155.01 and update as appropriate.

Estimated Start Date: December 1, 2016

Specific actions taken or expected to be taken: Conduct a comprehensive review of SOP 4155.01 to ensure that appropriate procedures are in place in order to confirm the integrity of protocol responses match supporting documentation.

Estimated Completion Date: March 31, 2017

Acronyms and Abbreviations

CAMS Compliance Assessment Management System

CDD Centralized Demilitarization Division

DEMIL Demilitarization

DLA Defense Logistics Agency

SOP Standard Operating Procedure

Whistleblower Protection

U.S. DEPARTMENT OF DEFENSE

The Whistleblower Protection Enhancement Act of 2012 requires the Inspector General to designate a Whistleblower Protection Ombudsman to educate agency employees about prohibitions on retaliation, and rights and remedies against retaliation for protected disclosures. The designated ombudsman is the DoD Hotline Director. For more information on your rights and remedies against retaliation, visit www.dodig.mil/programs/whistleblower.

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